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December 10, 2021

**VIA ECF**

Honorable Lewis A. Kaplan  
United States District Court  
500 Pearl Street  
New York, New York 10007-1312

USDC SDNY  
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Re: Giuffre v. Prince Andrew, Case No. 21-cv-06702-LAK  
Our File No. 7147-2

Dear Judge Kaplan:

We represent defendant Prince Andrew in the above-referenced action. Consistent with the Court's October 27, 2021 Order [ECF No. 29] and plaintiff Virginia Giuffre's November 26, 2021 letter requesting permission to file portions of her opposition brief and exhibits attached thereto under seal [ECF No. 40], we respectfully request leave to file, under seal, the portions of Prince Andrew's reply memorandum that quote from the sealed documents.

While Prince Andrew contends that none of the currently sealed documents should remain confidential, until that issue is ultimately decided by this Court, or by Judge Preska in the parallel proceeding, *Giuffre v. Dershowitz*, Case No. 19-cv-3377 (LAP), we are making this request to ensure compliance with all relevant court orders. However, Prince Andrew does so without prejudice to his right to later challenge the propriety of the confidential designation of the 2009 Release Agreement and the 2020 settlement agreement that plaintiff entered with Epstein's Estate.

Thank you.

Respectfully submitted,

  
ANDREW B. BRETTLER

cc: All counsel of record

SO ORDERED

  
LEWIS A. KAPLAN, USD

12/14/21